

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE AMERICAN INTERNATIONAL GROUP,
INC. 2008 SECURITIES LITIGATION

Master File No.:
08-CV-4772-LTS

ELECTRONICALLY FILED

This Document Relates To: All Actions

**NOTICE OF LEAD PLAINTIFF'S MOTION TO COMPEL THE
PRODUCTION OF DOCUMENTS BY DEFENDANTS
NOTWITHSTANDING FOREIGN SECRECY LAWS**

PLEASE TAKE NOTICE that upon the authorities and exhibits in the accompanying Memorandum of Law in Support of Lead Plaintiff's Motion to Compel the Production of Documents by Defendants Notwithstanding Foreign Secrecy Laws and Declaration of Jeffrey W. Golan in Support of Lead Plaintiff's Motion to Compel, and the parties having met and conferred concerning the present matter as indicated during the Pre-Trial Conference on November 5, 2010, Lead Plaintiff, The State Treasurer of Michigan, as custodian of the Michigan Public School Employees' Retirement System, the State Employees' Retirement System, the Michigan State Police Retirement System, and the Michigan Judges Retirement System (collectively, "Lead Plaintiff"), will move this Court, before the Honorable Laura Taylor Swain, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for entry of an order compelling the production of documents by defendants notwithstanding foreign secrecy laws, in the form attached hereto;

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's directive during the Pre-Trial Conference on November 5, 2010, papers in response to this motion or any portion

thereof must be filed and served on or before November 18, 2010, and reply papers in support of this motion must be filed and served on or before November 23, 2010.

Pursuant to Rule 2.B. of Judge Swain's Individual Rules of Practice, counsel for Lead Plaintiff certifies that they have used their best efforts to resolve informally with counsel for Defendants the matters raised in the present Motion to Compel. However, the attempts have been unsuccessful.

Dated: November 12, 2010

Respectfully submitted,

BARRACK, RODOS & BACINE

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